

Michael Kind, Esq.
Nevada Bar No. 13903
KAZEROUNI LAW GROUP, APC
6069 S. Fort Apache Rd., Ste. 100
Las Vegas, NV 89148
Phone: (800) 400-6808 x7
mkind@kazlg.com

David H. Krieger, Esq.
Nevada Bar No. 9086
HAINES & KRIEGER, LLC
8985 S. Eastern Avenue, Suite 350
Henderson, Nevada 89123
Phone: (702) 880-5554
dkrieger@hainesandkrieger.com
Attorneys for Plaintiff Dewann Williams

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

| | |
|---|---|
| Dewann Williams, Plaintiff, v. Santander Consumer USA, Inc., Defendant. | Case No.: 2:18-cv-00679-RFB-GWF JOINT STIPULATION AND ORDER TO EXTEND DISCOVERY (FIRST REQUEST) |
|---|---|

Plaintiff Dewann Williams (“Plaintiff”) and Defendants Santander Consumer USA, Inc. (“Defendant”) (jointly as “the Parties”), by and through their counsel of record, do hereby stipulate to modify the Court’s Order, ECF No. 10, to extend
(1) the last date to disclose experts from September 5, 2018 to **October 5, 2018**;

- 1 (2) the last date to disclose rebuttal experts from October 5, 2018 to **November 4,**
- 2 **2018;**
- 3 (3) the last date to complete discovery from November 4, 2018, to **December 4,**
- 4 **2018;**
- 5 (4) the last date to file dispositive motions from December 4, 2018, to **January 3,**
- 6 **2019;** and
- 7 (5) (3) the last date to file the proposed joint pretrial order from January 3, 2018,
- 8 **to February 5, 2019.**

9 Pursuant to LR 26-4, good cause exists to amend the Scheduling Order. The
10 Parties have diligently pursued discovery. Plaintiff has propounded written
11 discovery requests and noticed Defendant's deposition. The Parties are meeting and
12 conferring regarding Defendant's discovery responses. This request for extension of
13 deadlines is made specifically in this fee-shifting matter since experts and
14 depositions are a significant expense. The Parties seek additional time to disclose
15 experts until the discovery disputes are resolved and to reschedule Defendant's
16 deposition, because of scheduling conflicts.

17 Further good cause exists to amend the Scheduling Order to provide additional
18 time to complete ongoing settlement discussions.

19 Pursuant to LR 26-4(a), Plaintiff propounded written discovery requests upon
20 Defendant and noticed the deposition of Defendant. Defendant served Plaintiffs
21 with objections to Plaintiffs' written discovery requests.

22 Pursuant to LR 26-4(b), the Parties request additional time to conduct
23 Plaintiffs' deposition of Defendant and to disclose experts.

24 Pursuant to LR 26-4(c), this request for extension of deadlines is made
25 specifically in this fee-shifting matter since experts and deposition is a significant
26 expense.

27 Pursuant to LR 26-4(d), the Parties propose the following discovery schedule:

- 28 (1) last date to disclose experts: **October 5, 2018;**

- (2) last date to disclose rebuttal experts: **November 4, 2018**;
- (3) last date to complete discovery: **December 4, 2018**;
- (4) last date to file dispositive motions: **January 3, 2019**; and
- (5) last date to file the proposed joint pretrial order: **February 5, 2019**.

For the foregoing reasons, the Parties jointly request that this Court modify its May 31, 2018, Order to provide an additional 30 days to complete discovery, and the in the ordinary course file dispositive motions, and the proposed joint pretrial order as described in the proposed timeline above.

///

///

///

1 This is the Parties' first request for an extension of these deadlines.
2 DATED this 28th day of August 2018.

3
4 **KAZEROUNI LAW GROUP, APC**

5 By: /s/ Michael Kind
6 Michael Kind, Esq.
7 6069 S. Fort Apache Rd., Ste 100
8 Las Vegas, NV 89148
9 *Attorneys for Plaintiff*

10 **TROUTMAN SANDERS LLP**

11 By: /s/ Virginia Bell Flynn
12 Virginia Bell Flynn, Esq.
13 Chad R. Fuller, Esq.
14 1001 Haxall Point
15 Richmond, VA 23219

16 **ORDER**

17 IT IS HEREBY ORDERED that the Order, ECF No 10, is modified to extend
18 the discovery deadlines as follows:

- 19 (1) last date to disclose experts: **October 5, 2018**;
20 (2) last date to disclose rebuttal experts: **November 4, 2018**;
21 (3) last date to complete discovery: **December 4, 2018**;
22 (4) last date to file dispositive motions: **January 3, 2019**; and
23 (5) last date to file the proposed joint pretrial order: **February 5, 2019**.

24 IT IS SO ORDERED.

25 
26 George Foley Jr.
27 UNITED STATES MAGISTRATE JUDGE

28 Dated: 8/29/2018